



# INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

*We make Indiana a cleaner, healthier place to live.*

Joseph E. Kernan  
Governor

Lori F. Kaplan  
Commissioner

February 3, 2004

100 North Senate Avenue  
P.O. Box 6015  
Indianapolis, Indiana 46206-6015  
(317) 232-8603  
(800) 451-6027  
[www.in.gov/idem](http://www.in.gov/idem)

TO: Interested Parties / Applicant

RE: Tanco Terminals, Inc. / F127-17655-00046

FROM: Paul Dubenetzky  
Chief, Permits Branch  
Office of Air Quality

## Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

- (1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
- (2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
- (3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

- (1) the name and address of the person making the request;
- (2) the interest of the person making the request;
- (3) identification of any persons represented by the person making the request;
- (4) the reasons, with particularity, for the request;
- (5) the issues, with particularity, proposed for considerations at any hearing; and
- (6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures  
FNPER.dot 9/16/03



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## FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) RENEWAL OFFICE OF AIR QUALITY

**Tanco Terminals, Inc.  
400 East Boundary Road  
Portage, Indiana 46368**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

**The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.**

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F127-17655-00046	
Issued by:Original signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date:February 3, 2004  Expiration Date:February 3, 2009

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## SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

### A.1 General Information [326 IAC 2-8-3(b)]

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The Permittee owns and operates a stationary liquid organic compound storage source.

Authorized individual:	Environmental Health and Safety Manager
Source Address:	400 East Boundary Road, Portage, IN 46368
Mailing Address:	P.O. BOX 565, Hammond, IN 46325
General Source Phone:	(219) 937 4460
SIC Code:	4226
Source Location Status:	Porter
County Status:	Severe nonattainment for ozone
Source Status:	Unclassified or attainment for all other criteria pollutants
	Federally Enforceable State Operating Permit (FESOP)
	Minor Source, under PSD and Emission Offset;
	Minor Source, Section 112 of the Clean Air Act

### A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

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This stationary source consists of the following emission units and pollution control devices:

- (a) One (1) rail and semi-tanker loading rack operation, identified as LR1, with a maximum pumping capacity of 700 gallons of volatile organic liquids per minute and constructed in 1978.
- (b) Two (2) above ground organic liquid storage tanks, identified as ST-3 and ST-5, each with a maximum capacity of 840,000 gallons, exhausting at two (2) emissions points (S/V ID: V3 and V5), respectively (Tanks ST-3 and ST-5 were constructed in 1978 and 1983, respectively).
- (c) One (1) above ground organic liquid storage tank, identified as ST-4, with a maximum capacity of 1,008,000 gallons, exhausting at one (1) emission point (S/V ID: V4), and constructed in 1978.

### A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

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This *stationary* source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.
  - (1) One (1) natural gas fired thermal fluid heater rated at maximum heat capacity of 9.0 MMBtu/hr (constructed in 1998).

- (2) One (1) natural gas fired boiler, identified as EU-B1, rated at maximum heat capacity of 7.5 MMBtu/hr (constructed in 1964).
- (b) Forced and induced draft cooling water system not regulated under a NESHAP.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).
  - (1) Two (2) liquid asphalt storage tanks, identified as ST-1 and ST-2, each with maximum storage capacity of 2,730,000 gallons (both constructed in 1977).
  - (2) One (1) liquid asphalt storage tank, identified as ST-6, with a maximum storage capacity of 2,352,000 gallons (constructed in 1999).

**A.4 FESOP Applicability [326 IAC 2-8-2]**

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This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) to renew a Federally Enforceable State Operating Permit (FESOP).

**A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]**

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- (a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either
  - (1) incorporated as originally stated,
  - (2) revised, or
  - (3) deletedby this permit.
- (b) All previous registrations and permits are superseded by this permit.

## **SECTION B                      GENERAL CONDITIONS**

### **B.1      Permit No Defense [IC 13]**

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

### **B.2      Definitions [326 IAC 2-8-1]**

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

### **B.3      Permit Term [326 IAC 2-8-4(2)][326 IAC 2-1.1-9.5]**

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

### **B.4      Enforceability [326 IAC 2-8-6]**

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

### **B.5      Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]**

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

### **B.6      Severability [326 IAC 2-8-4(4)]**

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

### **B.7      Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]**

This permit does not convey any property rights of any sort, or any exclusive privilege.

### **B.8      Duty to Provide Information [326 IAC 2-8-4(5)(E)]**

- (a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.
- (b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1. When furnishing copies of requested records directly to U. S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

### **B.9      Compliance Order Issuance [326 IAC 2-8-5(b)]**

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.



**B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]**

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- (a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
- (b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.
- (c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

**B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]**

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- (a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. All certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:  
  
Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- (b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (c) The annual compliance certification report shall include the following:
  - (1) The appropriate identification of each term or condition of this permit that is the basis of the certification;
  - (2) The compliance status;
  - (3) Whether compliance was continuous or intermittent;
  - (4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and
  - (5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

**B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]**

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- (a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each facility:

- (1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;
  - (2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and
  - (3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.
- (b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.
- (c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

**B.13 Emergency Provisions [326 IAC 2-8-12]**

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- (a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.
- (b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:
- (1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;
  - (2) The permitted facility was at the time being properly operated;
  - (3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;
  - (4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, and IDEM Northwest Regional Office within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section)  
or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967

Telephone No.: 219-881-6712 (IDEM Northwest Regional Office)  
Facsimile No.: 219-881-6745 (IDEM Northwest Regional Office)

- (5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management  
Compliance Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

- (A) A description of the emergency;
- (B) Any steps taken to mitigate the emissions; and
- (C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (6) The Permittee immediately took all reasonable steps to correct the emergency.
- (c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.
  - (d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.
  - (e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.
  - (f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.
  - (g) Operations may continue during an emergency only if the following conditions are met:
    - (1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.
    - (2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:
      - (A) The Permittee immediately takes all reasonable steps to correct the

emergency situation and to minimize emissions; and

- (B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

- (h) The Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

- (a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination  
[326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

- (a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:
  - (1) That this permit contains a material mistake.
  - (2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.
  - (3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

- (c) Proceedings by IDEM, OAQ , to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]
- (d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAQ , at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ , may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

**B.16 Permit Renewal [326 IAC 2-8-3(h)]**

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- (a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, IN 46206-6015

- (b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]
  - (1) A timely renewal application is one that is:
    - (A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and
    - (B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
  - (2) If IDEM, OAQ upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.
- (c) Right to Operate After Application for Renewal [326 IAC 2-8-9]

If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ , any additional information identified as needed to process the application.

**B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]**

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- (a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.
- (b) Any application requesting an amendment or modification of this permit shall be submitted to:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]
- (d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

**B.18 Operational Flexibility [326 IAC 2-8-15][326 IAC 2-8-11.1]**

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- (a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:
- (1) The changes are not modifications under any provision of Title I of the Clean Air Act;
- (2) Any approval required by 326 IAC 2-8-11.1 has been obtained;
- (3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);
- (4) The Permittee notifies the:
- Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015
- and
- United States Environmental Protection Agency, Region V  
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)  
77 West Jackson Boulevard  
Chicago, Illinois 60604-3590
- in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

- (5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ , in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

- (b) Emission Trades [326 IAC 2-8-15(c)]  
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).
- (c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]  
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

**B.19 Permit Revision Requirement [326 IAC 2-8-11.1]**

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A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

**B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2][IC13-30-3-1] [IC 13-17-3-2]**

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Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

- (a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;
- (b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
- (c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;
- (d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and
- (e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

**B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]**

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- (a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

- (b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management  
Permits Branch, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

- (a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.
- (b) Failure to pay may result in administrative enforcement action, or revocation of this permit.
- (c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.



## SECTION C SOURCE OPERATION CONDITIONS

Entire Source
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### Emissions Limitations and Standards [326 IAC 2-8-4(1)]

#### C.1 Particulate Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) Pounds Per Hour [40 CFR 52 Subpart P][326 IAC 6-3-2]

- (a) Pursuant to 40 CFR 52 Subpart P, particulate matter emissions from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.
- (b) Pursuant to 326 IAC 6-3-2(e)(2), particulate emissions from any process not exempt under 326 IAC 6-3-1(b) or (c) which has a maximum process weight rate less than 100 pounds per hour and the methods in 326 IAC 6-3-2(b) through (d) do not apply shall not exceed 0.551 pounds per hour.

#### C.2 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

- (a) Pursuant to 326 IAC 2-8:
  - (1) The potential to emit volatile organic compounds (VOCs) from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period. This limitation shall also satisfy the requirements of 326 IAC 2-3 (Emission Offset);
  - (2) The potential to emit any regulated pollutant from the entire source, except particulate matter (PM) and volatile organic compounds (VOCs), shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period;
  - (3) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and
  - (4) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.
- (b) Pursuant to 326 IAC 2-3 (Emission Offset), potential to emit particulate matter (PM) from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period.
- (c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.
- (d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

**C.3 Opacity [326 IAC 5-1]**

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Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**C.4 Open Burning [326 IAC 4-1] [IC 13-17-9]**

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The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

**C.5 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]**

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The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

**C.6 Fugitive Dust Emissions [326 IAC 6-4]**

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The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**C.7 Operation of Equipment [326 IAC 2-8-5(a)(4)]**

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Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission unit vented to the control equipment is in operation.

**C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]**

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- (a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.
- (b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:
  - (1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or
  - (2) If there is a change in the following:
    - (A) Asbestos removal or demolition start date;

- (B) Removal or demolition contractor; or
- (C) Waste disposal site.
- (c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).
- (d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management  
Asbestos Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (e) **Procedures for Asbestos Emission Control**  
The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.
- (f) **Demolition and Renovation**  
The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).
- (g) **Indiana Accredited Asbestos Inspector**  
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

#### **Testing Requirements [326 IAC 2-8-4(3)]**

##### **C.9 Performance Testing [326 IAC 3-6]**

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- (a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015

Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).
- (c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the Permittee submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

#### **Compliance Requirements [326 IAC 2-1.1-11]**

##### **C.10 Compliance Requirements [326 IAC 2-1.1-11]**

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The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U. S. EPA.

#### **Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]**

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Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

##### **C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]**

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Any monitoring or testing required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

#### **Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

##### **C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]**

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If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the Permittee must comply with the applicable requirements of 40 CFR 68.

##### **C.14 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]**

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- (a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess

emissions from the affected facility while the response actions are being implemented.

- (b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.
- (c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

### **Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]**

#### **C.15 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]**

- (a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management  
Technical Support and Modeling Section, Office of Air Quality  
100 North Senate Avenue, P.O. Box 6015  
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

- (b) The emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

#### **C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]**

- (a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee shall furnish the records to the Commissioner within a reasonable time.
- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented upon issuance of this permit.

#### **C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]**

- (a) The Permittee shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the

“authorized individual” as defined by 326 IAC2-1.1-1(1).

- (b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management  
Compliance Data Section, Office of Air Quality  
100 North Senate Avenue, P. O. Box 6015  
Indianapolis, Indiana 46206-6015

- (c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.
- (d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).
- (e) Reporting periods are based on calendar years.

### **Stratospheric Ozone Protection**

#### **C.18 Compliance with 40 CFR 82 and 326 IAC 22-1**

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Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

- (a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156
- (b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.
- (c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

## SECTION D.1

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Loading Rack and Storage Tanks

- (a) One (1) rail and semi-tanker loading rack operation, identified as LR1, with a maximum pumping capacity of 700 gallons of volatile organic liquids per minute and constructed in 1978.
- (b) Two (2) above ground organic liquid storage tanks, identified as ST-3 and ST-5, each with a maximum capacity of 840,000 gallons, exhausting at two (2) emissions points (S/V ID: V3 and V5), respectively (Tanks ST-3 and ST-5 were constructed in 1978 and 1983, respectively).
- (c) One (1) above ground organic liquid storage tank, identified as ST-4, with a maximum capacity of 1,008,000 gallons, exhausting at one (1) emission point (S/V ID: V4), and constructed in 1978.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)] [326 IAC 8-1-6] [326 IAC 8-6] [326 IAC 8-7] [326 IAC 2-3]

- (a) The total annual throughput of Styrene through the storage tanks No. ST-3, ST-4 and ST-5 shall be limited to 73,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to Styrene (VOC, single HAP, and total HAPs) emissions of 3.02 tons per year.
- (b) The total annual throughput of Styrene through the rail and semi-tanker loading rack (LR1) shall be limited to 73,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to Styrene (VOC, single HAP, and total HAPs) emissions of 6.94 tons per year.

Compliance with above conditions shall limit the source-wide VOC, single HAP, and total HAPs emissions to less than 25, 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply. These limits will also render 326 IAC 2-3 (Emission Offset), 326 IAC 8-1-6, 326 IAC 8-6, and 326 IAC 8-7 not applicable.

#### D.1.2 Volatile Organic Compounds (VOC) [326 IAC 8-9-1]

Pursuant to 326 IAC 8-9-1 (Volatile Organic Liquid Storage Vessels), any change or modification, for the storage tanks (ST-3, ST-4, and ST-5), that would lead to an increase in true vapor pressure of the volatile organic liquid, as stored, to equal to or greater than 0.75 psia at the temperature stored, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 8-9-1, before such change can occur.

#### D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and any control devices.

### Compliance Determination Requirements

There are no specific Compliance Determination Requirements applicable to these emission units.

**Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]**

There are no specific compliance Monitoring Requirements applicable to these emission units.

**Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]**

**D.1.4 Record Keeping Requirements**

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- (a) To document compliance with Condition D.1.1 the Permittee shall maintain records in accordance with (1) through (2) below. Records maintained for (1) through (2) shall be compiled monthly and shall be complete and sufficient to establish compliance with the usage limits and/or the VOC and HAP emission limits established in Condition D.1.1.
  - (1) The amount of total Styrene throughput per month for storage tanks (ST-3, ST-4, and ST-5). Records shall include those documents as necessary to verify the type and amount of throughput. Examples may include, but are not limited to, shipping documents, bills of loading, purchase orders, pipeline schedules, throughput summaries, Material Safety Data Sheets, and/or other records that document volumes of the specific regulated material transferred.
  - (2) Total amount of Styrene throughput for each 12 consecutive month period for storage tanks (ST-3, ST-4, and ST-5).
- (b) Pursuant to 326 IAC 8-9-6 (Volatile Organic Liquid Storage Vessels), storage tanks identified as ST-3, ST-4, and ST-5 are subject to the following record keeping requirements.
  - (1) The Permittee shall keep copies of all records required by this section, except for the record required by paragraph (2) below, for at least two (2) years. The record required by paragraph (2) below will be kept for the life of the source.
  - (2) The Permittee shall keep readily accessible records showing the dimension of each storage vessel, identification number and an analysis showing the capacity of each storage vessel.
  - (3) Except as provided in 326 IAC 8-9-6(f) and (g), the Permittee of each storage vessel either with a design capacity greater than or equal to thirty-nine thousand (39,000) gallons storing a liquid with a maximum true vapor pressure greater than or equal to five-tenths (0.5) pound per square inch absolute (psia) but less than seventy-five hundredths (0.75) psia shall maintain a record of the maximum true vapor pressure of the VOL, a record of the VOL stored, the period of storage, and the maximum true vapor pressure of that VOL during the respective storage period.
  - (4) Except as provided in paragraph 326 IAC 8-9-6(g), the Permittee of each storage vessel either with a design capacity greater than or equal to thirty-nine thousand (39,000) gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall maintain a record and notify the Administrator (IDEM) within 30 days when the maximum true vapor pressure of the liquid exceeds the respective maximum true vapor pressure values for each volume range.
- (c) To document compliance with Condition D.1.4, the Permittee shall maintain records of daily visible check for liquid leaks for the storage tanks ST-3, ST-4, and ST-5 and loading



rack LR1.

- (d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

#### D.1.5 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

## SECTION D.2

## FACILITY OPERATION CONDITIONS

### Facility Description [326 IAC 2-8-4(10)]:

#### Insignificant Activities:

- (a) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.
  - (1) One (1) natural gas fired thermal fluid heater rated at maximum heat capacity of 9.0 MMBtu/hr (constructed in 1998).
  - (2) One (1) natural gas fired boiler, identified as EU-B1, rated at maximum heat capacity of 7.5 MMBtu/hr (constructed in 1964).
- (b) Forced and induced draft cooling water system not regulated under a NESHAP.
- (c) Paved and unpaved roads and parking lots with public access.
- (d) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).
  - (1) Two (2) liquid asphalt storage tanks, identified as ST-1 and ST-2, each with maximum storage capacity of 2,730,000 gallons (both constructed in 1977).
  - (2) One (1) liquid asphalt storage tank, identified as ST-6, with a maximum storage capacity of 2,352,000 gallons (constructed in 1999).

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

### Emission Limitations and Standards [326 IAC 2-8-4(1)]

#### D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-3]

Pursuant to 326 IAC 6-2-3 (a) (Particulate emission limitations for sources of indirect heating: emission limitations for facilities specified in 326 IAC 6-2-1 (b)), particulate emissions from Boiler EU-B1, which was existing and in operation on or before June 8, 1972, shall be limited to 3.47 pounds of particulate matter per million British thermal units heat input.

#### D.2.2 Petroleum Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

Pursuant to 40 CFR 60.110, Subpart Kb (Volatile Organic Liquid Storage Vessels), any change or modification, for the storage tank (ST-6), that would lead to an increase in true vapor pressure of the petroleum liquid, as stored, to equal to or greater than 3.5 kPa at the temperature stored, shall obtain approval from the Office of Air Quality (OAQ), as required by 326 IAC 12, 40 CFR 60.110, before such change can occur.

### Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

#### D.2.3 Record Keeping Requirements [40 CFR 60.110b, Subpart Kb]

- (a) Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), storage tank identified as ST-6 is subject to following record keeping requirements.

The Permittee shall maintain permanent records at the source in accordance with (1) through (3) below:

- (1) the dimension of the storage vessel;
  - (2) an analysis showing the capacity of the storage vessel; and
  - (3) vapor pressure of organic liquid stored in tank ST-6
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
CERTIFICATION**

Source Name: Tanco Terminals, Inc.  
Source Address: 400 East Boundary Road, Portage, IN 46368  
Mailing Address: P. O. Box 505, Hammond, IN 46325  
FESOP No.: F127-17655-00046

**This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.**

Please check what document is being certified:

- ? Annual Compliance Certification Letter
- ? Test Result (specify) \_\_\_\_\_
- ? Report (specify) \_\_\_\_\_
- ? Notification (specify) \_\_\_\_\_
- ? Affidavit (specify) \_\_\_\_\_
- ? Other (specify) \_\_\_\_\_

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE BRANCH  
P.O. Box 6015  
100 North Senate Avenue  
Indianapolis, Indiana 46206-6015  
Phone: 317-233-5674  
Fax: 317-233-5967**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
EMERGENCY OCCURRENCE REPORT**

Source Name: Tanco Terminals, Inc.  
Source Address: 400 East Boundary Road, Portage, IN 46368  
Mailing Address: P. O. Box 505, Hammond, IN 46325  
FESOP No.: F127-17655-00046

**This form consists of 2 pages**

**Page 1 of 2**

? This is an emergency as defined in 326 IAC 2-7-1(12)  
?The Permittee must notify the Office of Air Quality (OAQ), within four (4) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and  
?The Permittee must submit notice in writing or by facsimile within two (2) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:

Control Equipment:

Permit Condition or Operation Limitation in Permit:

Description of the Emergency:

Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A

**Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency?    Y    N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO <sub>2</sub> , VOC, NO <sub>x</sub> , CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_

A certification is not required for this report.

Tanco Terminals, Inc.  
Portage, Indiana  
Permit Reviewer: AY/EVP

Page 30 of 35  
F127-17655-00046

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Tanco Terminals, Inc.  
Source Address: 400 East Boundary Road, Portage, IN 46368  
Mailing Address: P. O. Box 505, Hammond, IN 46325  
FESOP No.: F127-17655-00046  
Facility: Storage Tanks ST-3, ST-4, and ST-5  
Parameter: VOC/HAP  
Limit: The total annual throughput of Styrene through the storage tanks No. ST-3, ST-4 and ST-5 shall be limited to 73,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to Styrene (VOC, single HAP, and total HAPs) emissions of 3.02 tons per year.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_  
Title / Position: \_\_\_\_\_  
Signature: \_\_\_\_\_  
Date: \_\_\_\_\_  
Phone: \_\_\_\_\_



Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FESOP Quarterly Report**

Source Name: Tanco Terminals, Inc.  
Source Address: 400 East Boundary Road, Portage, IN 46368  
Mailing Address: P. O. Box 505, Hammond, IN 46325  
FESOP No.: F127-17655-00046  
Facility: Loading Rack (LR1)  
Parameter: VOC/HAP  
Limit: The total annual throughput of Styrene through the rail and semi-tanker loading rack (LR1) shall be limited to 73,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to Styrene (VOC, single HAP, and total HAPs) emissions of 6.94 tons per year.

YEAR: \_\_\_\_\_

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

? No deviation occurred in this quarter.

? Deviation/s occurred in this quarter.

Deviation has been reported on: \_\_\_\_\_

Submitted by: \_\_\_\_\_

Title / Position: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT  
OFFICE OF AIR QUALITY  
COMPLIANCE DATA SECTION**

**FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)  
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT**

Source Name: Tanco Terminals, Inc.  
Source Address: 400 East Boundary Road, Portage, IN 46368  
Mailing Address: P. O. Box 505, Hammond, IN 46325  
FESOP No.: F127-17655-00046

Months: \_\_\_\_\_ to \_\_\_\_\_ Year: \_\_\_\_\_

Page 1 of 2

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

? NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

? THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

**Probable Cause of Deviation:**

**Response Steps Taken:**

**Permit Requirement** (specify permit condition #)

**Date of Deviation:**

**Duration of Deviation:**

**Number of Deviations:**

<b>Probable Cause of Deviation:</b>
<b>Response Steps Taken:</b>

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

  

<b>Permit Requirement</b> (specify permit condition #)	
<b>Date of Deviation:</b>	<b>Duration of Deviation:</b>
<b>Number of Deviations:</b>	
<b>Probable Cause of Deviation:</b>	
<b>Response Steps Taken:</b>	

Form Completed By: \_\_\_\_\_

Title/Position: \_\_\_\_\_

Date: \_\_\_\_\_

Phone: \_\_\_\_\_

Attach a signed certification to complete this report.

**Indiana Department of Environmental Management  
Office of Air Quality**

**Addendum to the  
Technical Support Document (TSD) for a Federally Enforceable State Operating  
Permit (FESOP) Renewal**

**Source Background and Description**

<b>Source Name:</b>	Tanco Terminals, Inc.
<b>Source Location:</b>	400 East Boundry Road, Portage, Indiana 46368
<b>County:</b>	Porter
<b>SIC Code:</b>	4226
<b>Operation Permit No.:</b>	F127-17655-00046
<b>Permit Reviewer:</b>	Adeel Yousuf/EVP

On December 12, 2003, the Office of Air Quality (OAQ) had a notice published in the Vidette Times in Munster, Indiana, stating that Tanco Terminals, Inc. had applied for a Federally Enforceable State Operating Permit (FESOP) Renewal for the operation of a liquid organic compound storage terminal. The notice also stated that OAQ proposed to issue a Federally Enforceable State Operating Permit Renewal for this operation and provided information on how the public could review the proposed FESOP Renewal and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this FESOP Renewal should be issued as proposed.

On January 8, 2004, Elizabeth J. Hill of Bruce Carter Associates, LLC, submitted comments on the proposed FESOP renewal permit. The summary of the comments and corresponding responses is as follows (bolded language has been added and the language with a line through it has been deleted).

**Comment 1**

Condition C.11 (Compliance Monitoring) states that, "Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit." This is inconsistent with C.16 General Record Keeping Requirements which states that, "Unless otherwise specified in this permit, all recordkeeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance." Please correct the inconsistencies in these permit conditions.

**Response 1**

All monitoring and recordkeeping requirements in this FESOP renewal permit were previously required by the original FESOP (F127-9914-00046). These requirements should have already been implemented by the Permittee. Ninety (90) days was listed in the original FESOP to allow for new monitoring and/or recordkeeping requirements. Since there are no new monitoring or recordkeeping requirements legally required in this permit, it is not necessary to allow 90 days to implement existing requirements. Therefore, the following change has been made in the recordkeeping condition as a result of this comment.

C.16 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

- (b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented ~~within ninety (90) days~~ **upon issuance of this permit issuance.**

**Comment 2**

There is a citation missing in C.13 Risk Management Plan. The citation should be inserted after the phrase, "If a regulated substance as defined in."

**Response 2**

Condition C.13 has been revised to add in the rule citation.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in **40 CFR 68**, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

**Comment 3**

The wrong icon was used in the Certification Forms instead of a check box there is a telephone icon.

**Response 3**

All the icons on the Certification Forms have been reviewed and confirmed to be already in 'check box' format. There will be no change as a result of this comment.

Upon further review, the OAQ has decided to make the following changes to the FESOP renewal. Bolded language has been added and the language with a line through it has been deleted.

1. Following typographical errors have been corrected under the Table of Contents.

**SECTION D.1 FACILITY OPERATION CONDITIONS**

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.1.1 Volatile Organic Compounds (VOC) and Hazardous Air Pollutants (HAPs)  
[326 IAC 2-8-4(1)] **[326 IAC 8-1-6] [326 IAC 8-6] [326 IAC 8-7] [326 IAC 2-3]**

**SECTION D.2 FACILITY OPERATION CONDITIONS**

Emission Limitations and Standards [326 IAC 2-8-4(1)]

- D.2.1 Particulate Emission Limitations for Sources of Indirect Heating [326 IAC 6-2-**43**]  
D.2.2 Petroleum Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

~~Compliance Determination Requirements~~

~~Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]~~

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

- D.2.3 Record Keeping Requirements **[40 CFR 60.110b, Subpart Kb]**

Emergency Occurrence Form .....	28-29
FESOP Usage Report Forms. ....	30-31
Quarterly Deviation and Compliance Monitoring Report Form.....	32-33

2. Condition B.12 has been revised to remove an extra comma from B.12(c).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]  
(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

3. Condition B.13 has been revised to mention IDEM Northwest Regional Office and the phone number has been revised as well.

B.13 Emergency Provisions [326 IAC 2-8-12]  
(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ, **and IDEM Northwest Regional Office** within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;  
  
Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,  
Telephone No.: 317-233-5674 (ask for Compliance Section)  
Facsimile No.: 317-233-5967  
Telephone No.: 219-881-6725 **12** (IDEM Northwest Regional Office)  
Facsimile No.: 219-881-6745 (IDEM Northwest Regional Office)

4. Condition C.12 has been revised to clarify the language.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]  
Any monitoring or testing ~~performed~~ required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

5. Section D.1 has been revised to describe the units covered in the section.

#### SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]:

##### **Loading Rack and Storage Tanks**

- (a) One (1) rail and semi-tanker loading rack operation, identified as LR1, with a maximum pumping capacity of 700 gallons of volatile organic liquids per minute and constructed in 1978.

6. Conditions C.10, C.15 and C.19 have been updated to change "source" to "Permittee".

C.9 Performance Testing [326 IAC 3-6]  
(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the ~~source~~ **Permittee** submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

C.13 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance as defined in is present at a source in more than a threshold quantity, the ~~source~~ **Permittee** must comply with the applicable requirements of 40 CFR 68.

C.17 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

- (a) The ~~source~~ **Permittee** shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC2-1.1-1(1).



## Indiana Department of Environmental Management Office of Air Quality

### Technical Support Document (TSD) for a Federally Enforceable State Operating Permit (FESOP) Renewal

#### Source Background and Description

**Source Name:** Tanco Terminals, Inc.  
**Source Location:** 400 East Boundary Road, Portage, Indiana 46368  
**County:** Porter  
**SIC Code:** 4226  
**Operation Permit No.:** F127-17655-00046  
**Permit Reviewer:** Adeel Yousuf / EVP

The Office of Air Quality (OAQ) has reviewed a FESOP renewal application from Tanco Terminals, Inc. relating to the stationary operation of a liquid organic compound storage source.

#### Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

- (a) One (1) rail and semi-tanker loading rack operation, identified as LR1, with a maximum pumping capacity of 700 gallons of volatile organic liquids per minute and constructed in 1978.
- (b) Two (2) above ground organic liquid storage tanks, identified as ST-3 and ST-5, each with a maximum capacity of 840,000 gallons, exhausting at two (2) emissions points (S/V ID: V3 and V5), respectively (Tanks ST-3 and ST-5 were constructed in 1978 and 1983, respectively).
- (c) One (1) above ground organic liquid storage tank, identified as ST-4, with a maximum capacity of 1,008,000 gallons, exhausting at one (1) emission point (S/V ID: V4), and constructed in 1978.

#### Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

#### Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

- (a) Natural gas-fired combustion sources with heat input equal or less than ten (10) mmBtu/hr.
  - (1) One (1) natural gas fired thermal fluid heater rated at maximum heat capacity of 9.0 MMBtu/hr (constructed in 1998).
  - (2) One (1) natural gas fired boiler, identified as EU-B1, rated at maximum heat capacity of 7.5 MMBtu/hr (constructed in 1964).
- (b) Forced and induced draft cooling water system not regulated under a NESHAP.
- (c) Paved and unpaved roads and parking lots with public access.

- (d) Blowdown of any of the following: sight glass; boiler; compressors; pumps; and cooling tower.
- (e) Other categories with emissions below insignificant thresholds (i.e. less than 3 pounds per hour VOC).
  - (1) Two (2) liquid asphalt storage tanks, identified as ST-1 and ST-2, each with maximum storage capacity of 2,730,000 gallons (both constructed in 1977).
  - (2) One (1) liquid asphalt storage tank, identified as ST-6, with a maximum storage capacity of 2,352,000 gallons (constructed in 1999).

### Existing Approvals

The source has been operating under the following previous approvals:

- (a) FESOP 127-9914-00046, issued on February 2, 1999.
- (b) First Administrative Amendment No.: 127-10463-00046, issued on March 8, 1999.
- (c) First Permit Reopening 127-13099-00046, issued on October 2, 2001.
- (d) Second Administrative Amendment No.: 127-17870-00046, issued on September 12, 2003.

All conditions from previous approvals were incorporated into this FESOP except the following:

- (a) FESOP 127-9914-00046, issued on February 2, 1999.
  - (1) Condition: D.1.1 Hazardous Air Pollutants (HAPs) [326 IAC 2-8-4(1)] [326 IAC 8-1-6]

---

    - (a) The total throughput of styrene monomer to the storage tanks identified as ST-3, ST-4, and ST-5 shall be limited to 87,000,000 gallons per twelve (12) month period, rolled on a monthly basis.
    - (b) The total loading of styrene through the rail and semi-tanker loading rack identified as LR1 is limited to 87,000,000 gallons per twelve (12) consecutive month period, rolled on a monthly basis.
  - Reason not incorporated: Conditions D.1.1 (a) and (b) contain a Styrene throughput limit of 87,000,000 gallons per year for the storage tanks (ST-3, ST-4, and ST-5) and the loading rack (LR1), respectively. However, based on the updated emission calculations using the Tanks 4.09 program, the source will need to limit Styrene throughput to less than 73,000,000 gallons per year. This throughput limit is required to limit the single HAP (Styrene) emissions to less than 10 tons per year.
  - (2) Condition: D.1.2 Volatile Organic Liquid Storage Vessel [326 IAC 12][40 CFR 60.110, Subpart Kb]

---

Pursuant to 40 CFR Part 60.110b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), the 1,017,000 gallon styrene storage

tank identified as ST-4, with a vapor pressure of less than 3.5 kPa, is subject to 40 CFR Part 60.116b, paragraphs (a) through (c) which requires record keeping.

Reason not incorporated:

Storage tank ST-4 is determined to be not subject to the requirements of 40 CFR Part 60.11b, Subpart Kb (Standards of Performance for Volatile Organic Liquid Storage Vessels), because this tank was originally constructed in 1978 prior to the rule applicability date of July 23, 1984.

### Enforcement Issue

There are no enforcement actions pending.

### Recommendation

The staff recommends to the Commissioner that the FESOP Renewal be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete FESOP Renewal application for the purposes of this review was received on May 1, 2003.

There was no notice of completeness letter mailed to the source.

### Emission Calculations

See Appendix A of this document for detailed emissions calculations (Appendix A, pages 1 through 5).

### Unrestricted Potential Emissions

This table reflects the unrestricted potential emissions of the source, excluding the emission limits that were contained in the previous FESOP.

Pollutant	Unrestricted Potential Emissions (tons/yr)
PM	0.14
PM-10	0.66
SO <sub>2</sub>	0.04
VOC	43.73
CO	6.07
NO <sub>x</sub>	7.23

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Unrestricted Potential Emissions (tons/yr)
Styrene	greater than 10
Hexane	less than 10

TOTAL	greater than 25
-------	-----------------

- (a) The unrestricted potential to emit of VOC is equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (b) The unrestricted potential emissions of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.
- (c) Fugitive Emissions  
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

### Potential to Emit After Issuance

The source, issued a FESOP on February 2, 1999, has opted to remain a FESOP source, rather than apply for a Part 70 Operating Permit. The table below summarizes the potential to emit, reflecting all limits, of the emission units. Any control equipment is considered enforceable only after issuance of this Federally Enforceable State Operating Permit and only to the extent that the effect of the control equipment is made practically enforceable in the permit. Since the source has not constructed any new emission units, the source's potential to emit is based on the emission units included in the original FESOP 127-9914-00046; issued on February 2, 1999.

Process/facility	Potential to Emit (tons/year)						
	PM	PM-10	SO <sub>2</sub>	VOC	CO	NO <sub>x</sub>	HAPs
Storage Tanks (ST-3, ST-4, and ST-5)	--	--	--	3.02	--	--	3.02 (single)
Loading Rack (LR1)	--	--	--	6.94	--	--	6.94 (single)
Insignificant Activities *	0.14	0.66	0.04	0.40	6.07	7.23	0.136 (single) 0.140 (total)
Total Emissions	0.14	0.66	0.04	10.36	6.07	7.23	9.96 (single) 10.10 (total)

### County Attainment Status

The source is located in Porter County.

Pollutant	Status
PM-10	attainment
SO <sub>2</sub>	attainment
NO <sub>2</sub>	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

- (a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Porter County has been designated as nonattainment for ozone.
- (b) Porter County has been classified as attainment or unclassifiable for all other criteria pollutants.

### **Federal Rule Applicability**

There are no new federal rules applicable to the source during this FESOP review process. The applicability determination that follows is based on that conducted for original FESOP F127-9914-00046, issued on February 2, 1999.

- (a) The three (3) Styrene storage tanks identified as ST-3, ST-4 and ST-5, installed in 1978, 1978 and 1983, respectively, are not subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, or 110a - 115a as Subparts K, and Ka, respectively) because these tanks do not store a petroleum liquid as defined in the rule. Therefore, the requirements under these subparts are not applicable. Tanks ST-3, ST-4 and ST-5 are also not subject to the requirements of 326 IAC 12, (40 CFR Parts 60.110b as Subpart Kb) because these tanks were constructed prior to the rule applicability date of July 23, 1984.
- (b) The two (2) asphalt storage tanks identified as ST-1 and ST-2 (listed under insignificant activities), both installed in 1977, are not subject to the requirements of New Source Performance Standard, 326 IAC 12, (40 CFR Parts 60.110, or 110a - 115a as Subparts K, and Ka, respectively) because these tanks do not store a petroleum liquid as defined in the rule.
- (c) One (1) asphalt storage tank identified as ST-6 (listed under insignificant activities) is subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb) because this tank was installed after July 23, 1984, and has a storage capacity greater than 75 cubic meters. However, since this tank has a storage capacity greater than 151 cubic meters, and the liquid asphalt cement stored in the tank has a maximum true vapor pressure of less than 3.5 kPa, this tank is subject to only 40 CFR Part 60.116b, paragraph (a) through (c) which requires record keeping.
- (d) There are no National Emission Standards for Hazardous Air Pollutants (NESHAPs)(326 IAC 14 and 40 CFR Part 61) applicable to this source.
- (e) This source is not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR Part 63.2330, Subpart EEEE (Organic Liquids Distribution(Non-gasoline))), because this source is not a major source of HAP. The source has chosen to limit the source wide emissions of any combination of HAPs and any single HAP to less than 25 and 10 tons per twelve (12) consecutive month period, respectively, by limiting the annual Styrene throughput to less than 73,000 kgals.
- (f) The requirements of 40 CFR Part 64, Compliance Assurance Monitoring, are not applicable to this source. Generally, such requirements apply to a Part 70 source that involves a pollutant-specific emissions unit (PSEU), as defined in 40 CFR 64.1, that meets the following criteria:
  - (1) the unit is subject to an emission limitation or standard for an applicable regulated air pollutant,

- (2) the unit uses a control device as defined in 40 CFR 64.1 to comply with that emission limitation or standard, and
- (3) the unit has a potential to emit before controls equal to or greater than the applicable Part 70 major source threshold for the regulated pollutant.

As a FESOP source, this source has accepted federally enforceable limits such that the requirements of 326 IAC 2-7 (Part 70) do not apply. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable to this source.

- (g) The requirements of Section 112(j) of the Clean Air Act (40 CFR Part 63.50 through 63.56) are not applicable to this source, because the source has a limited potential to emit of less than 10 tons per year of a single HAP and less than 25 tons per year of the combination of HAPs.

#### **State Rule Applicability - Entire Source**

There are no new state rules applicable to the entire source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 127-9914-00046; issued on February 2, 1999.

#### **326 IAC 2-2 (Prevention of Significant Deterioration (PSD)) and 326 IAC 2-3 (Emission Offset)**

This source constructed in 1978 is not subject to the requirements of 326 IAC 2-2 because it is not one of the 28 listed source categories, no major modifications were done and the potential to emit of all regulated pollutants are less than 100 tons per year and the potential to emit of VOC is less than 25 tons per year. Therefore, the requirements of 326 IAC 2-2 (PSD) and 326 IAC 2-3 (Emission Offset) do not apply.

#### **326 IAC 2-4.1-1 (New Source Toxics Control)**

This source is not subject to 326 IAC 2-4.1-1 (New Source Toxics Control) because no new or reconstructed facilities with a PTE of any single HAP at 10 tons per year or 25 tons per year of the combination HAPs have been installed since July 27, 1997. Therefore, 326 IAC 2-4.1-1 does not apply.

#### **326 IAC 2-6 (Emission Reporting)**

This source is subject to 326 IAC 2-6 (Emission Reporting), because it is located in Porter County, a specifically listed county and has the potential to emit more than ten (10) tons per year of VOC. Pursuant to this rule, the owner/operator of the source must submit an emission statement for the source. The statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6 and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8).

#### **326 IAC 2-8-4 (FESOP)**

This source is subject to 326 IAC 2-8-4 (FESOP). Pursuant to this rule, the following conditions shall apply:

- (1) The loading of Styrene through the loading rack (LR1) shall be limited to 73,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to limited Styrene (VOC, single HAP, and total HAPs) emissions of 6.94 tons per year.
- (2) The total throughput of Styrene through storage tanks ID ST-3, ST-4, and ST-5 shall be limited to 73,000,000 gallons per twelve (12) consecutive month period with compliance determined at the end of each month. This is equivalent to Styrene (VOC, single HAP, and total HAPs) emissions of 3.02 tons per year.

Compliance with above conditions shall limit the source-wide VOC, single HAP, and total HAPs emissions to less than 25, 10 and 25 tons per twelve (12) consecutive month period with compliance determined at the end of each month, respectively. Therefore, the requirements of 326 IAC 2-7 (Part 70) do not apply. These limits will also render 326 IAC 2-3 (Emission Offset) not applicable.

**326 IAC 5-1 (Opacity Limitations)**

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

- (a) Opacity shall not exceed an average of forty percent (40%) any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.
- (b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

**326 IAC 6-4 (Fugitive Dust Emissions)**

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

**326 IAC 6-5 (Fugitive Particulate Matter Emission Limitations)**

This source is not subject to 326 IAC 6-5, for fugitive particulate matter emissions, because the fugitive particulate matter emissions from this source are less than 25 tons per year.

**State Rule Applicability - Individual Facilities**

There are no new state rules determined as applicable to individual facilities at this source during this FESOP renewal review process. The applicability determination that follows is based on that conducted for original FESOP 127-9914-00048; issued on February 2, 1999.

**326 IAC 6-2-3 (Particulate Emission Limitations for Sources of Indirect Heating)**

The one (1) natural gas fired boiler (EU-B1), with a maximum capacity of 7.5 MMBtu/hr and constructed in 1964, is subject to the particulate matter limitations of 326 IAC 6-2. Pursuant to this rule, particulate emissions from indirect heating facilities constructed prior to September 21, 1983, shall be limited by the following equation:

$$Pt = \frac{C \times a \times h}{76.5 \times Q^{0.75} \times N^{0.25}}$$

where

- C = 50 u/m<sup>3</sup>
- Pt = emission rate limit (lbs/mmBtu)
- Q = total source heat input capacity (mmBtu/hr)
- N = number of stacks
- a = plume rise factor (0.67)
- h = stack height in feet. If a number of stacks of different heights exist, average stack height to represent "N" stacks shall be calculated by weighing each stack height with its particulate matter emission rate as follows:

$$h = \frac{\sum_{i=1}^N H_i \times p_{a_i} \times Q_i}{\sum_{i=1}^N p_{a_i} \times Q_i}$$

where:  $P_a$  = the actual controlled emissions rate in lb/mmBtu using the emission factor from AP-42 or stack test data. Stacks constructed after January 1, 1971, shall be credited with GEP stack height only. GEP stack height shall be calculated as specified in 326 IAC 1-7.

For boiler EU-B1 ( $Q = 7.5 = 7.5$  mmBtu/hr)  
 $P_t = (50 \times 0.67 \times 36) / (76.5 \times 7.5^{0.75} \times 1^{0.25}) = 3.47$  lbs PM/mmBtu

compliance calculation:

Potential PM emissions for boiler (EU-B1) =  $1.9 \text{ lb PM/MMCF} \times (1/1000) \text{ (MMCF/MMBtu)} = 0.0019$  lbs PM/MMBtu

Potential PM emissions for the boiler EU-B1 (0.0019 lbs PM/MMBtu) are less than the allowable 3.47 lbs PM/MMBtu, therefore the boiler will comply with the requirements of 326 IAC 6-2-4.

326 IAC 8-1-6 (General Reduction Requirements)

This rule applies to facilities located anywhere in the state that were constructed on or after January 1, 1980, which have potential volatile organic compound (VOC) emissions of 25 tons per year or more, and are not otherwise regulated by other provisions of Article 8. This source shall limit the throughput of Styrene to less than 73,000,000 gallons per year. This will limit the source wide potential to emit VOC to less than 25 tons per year. Therefore, rule 326 IAC 8-1-6 does not apply to this source.

326 IAC 8-4 (Petroleum Sources)

- (a) Pursuant to 326 IAC 8-4-1, the three (3) asphalt storage tanks (ST-1, ST-2, and ST-6) are subject to 326 IAC 8-4-3 (Petroleum liquid storage facilities) because they each have a storage capacity greater than 39,000 gallons and were constructed after January 1, 1980. However, these asphalt storage tanks contain a liquid whose true vapor pressure is less than 10.5 kPa. Therefore, 326 IAC 8-4-3 is not applicable.
- (b) The three (3) styrene storage tanks ST-3, ST-4, and ST-5 are not subject to any regulations in 326 IAC 8-4 (Petroleum Sources), because they do not contain any petroleum liquids as defined by this rule.

326 IAC 8-6 (Organic Solvent Emission Limitations)

This rule applies to sources existing as of January 1, 1980, located in Lake and Marion Counties, as well as to facilities commencing operation after October 7, 1974 and prior to January 1, 1980 that are located anywhere in the state, with potential VOC emissions of 100 tons per year or more, and not regulated by any other provision of Article 8. This source is located in Porter County and, as a FESOP source, shall limit total VOC to less than 25 tons per year. Therefore, this rule does not apply to this source.

326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

The requirements of this rule apply to stationary sources located in Lake, Porter, Clark and Floyd Counties that emit or have the potential to emit VOCs at levels equal to or greater than 25 tons per year in Lake and Porter Counties; 100 tons per year in Clark and Floyd Counties; and to any coating facility that emits or has the potential to emit 10 tons per year or greater in Lake, Porter, Clark or Floyd County. This source is located in Porter County, a regulated county, but the source



has potential to emit of VOC less than 25 tons per year. Therefore, this rule is not applicable to this source.

#### 326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

This rule applies to stationary vessels used to store volatile organic liquid (VOL) that are located in Clark, Floyd, Lake, or Porter County.

- (a) Pursuant to 326 IAC 8-9-2(8) (Exemptions), the three (3) asphalt storage tanks ST-1, ST-2, and ST-6 (see insignificant activities) are not subject to the regulations of 326 IAC 8-9 because they are subject to 40 CFR 60, Subpart Kb (New Source Performance Standard for Volatile Organic Liquid Storage).
- (b) The three (3) styrene storage tanks ST-3, ST-4, and ST-5, each have capacities greater than 39,000 gallons and store a VOL with a maximum true vapor pressure less than five tenths (0.5) pound per square inch absolute (psia), therefore, they are only subject to 326 IAC 8-9-6 (Record Keeping and Reporting Requirements). The owner or operator shall maintain the following records for the life of the vessel:
  - 1. The vessel identification number;
  - 2. The vessel dimensions;
  - 3. The vessel capacity;
  - 4. pursuant to 326 IAC 8-9-6(h), vessels with a design capacity greater than or equal to 39,000 gallons storing a liquid with a maximum true vapor pressure that is normally less than 0.75 psia shall maintain a record and notify the department within thirty (30) days when the maximum true vapor pressure of the liquid exceeds 0.75 psia.

#### Testing Requirements

IDEM may require compliance testing at any specific time to determine if the source is in compliance with an applicable limit or standard. There are presently no emission limits or standards applicable to the Loading Rack and Storage Tanks at this source, and therefore no emissions testing is required in this FESOP renewal permit.

#### Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The following compliance requirements for loading rack LR1 from previous approval was not incorporated into this FESOP.

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**D.1.6 Daily Visible Checks for Liquid Leaks**

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- (a) Daily checks for liquid leaks during loading into tanks ST-3, ST-4, and ST-5 and unloading operations utilizing the rail and semi-tanker loading rack LR1 shall be performed during normal daylight operations when the facility is in operation. A trained employee will record any visible liquid leaks and the date of such leaks.
- (b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.
- (c) In the case of batch or discontinuous operations, checks shall be taken during that part of the operation that would normally be expected to cause the greatest potential for liquid leaks.
- (d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of liquid leaks for that specific process.
- (e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a liquid leak is observed.

Reason not incorporated:

Condition D.1.6 which contains compliance monitoring requirements for the loading rack (LR1) is not valid because there is no control device for this loading rack and the actual emissions are less than 25 tons per year. Total VOC emissions from the loading rack are limited to 6.94 tons per year based on limited Styrene loading throughput 73,000,000 gallons per year.

There are no other compliance requirements applicable to this source.

**Conclusion**

The operation of this organic liquid compound storage source shall be subject to the conditions of the attached proposed FESOP No.: F127-17635-00046.

**Appendix A: Emission Calculations**

**Company Name:** Tanco Terminals, Inc.  
**Address City IN Zip:** 400 East Boundary Road, Portage, IN 46368  
**FESOP:** F035-16539-00018  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** October 11, 2003

Total Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Storage Tanks	Loading Rack	Insignificant Activities *	TOTAL
PM	0.00	0.00	0.14	0.14
PM10	0.00	0.00	0.66	0.66
SO2	0.00	0.00	0.04	0.04
NOx	0.00	0.00	7.23	7.23
VOC	8.33	35.00	0.40	43.73
CO	0.00	0.00	6.07	6.07
total HAPs	8.33	35.00	0.14	43.47
worst case single HAP	8.33 (Styrene)	35.00 (Styrene)	0.136 (Hexane)	43.33 (Styrene)
Total emissions based on rated capacities at 8,760 hours/year.				
* Insignificant activities consist of one ng fired boiler and one ng fired thermal fluid heater.				
Limited Potential To Emit (tons/year)				
Emissions Generating Activity				
Pollutant	Storage Tanks	Loading Rack	Insignificant Activities *	TOTAL
PM	0.00	0.00	0.14	0.14
PM10	0.00	0.00	0.66	0.66
SO2	0.00	0.00	0.04	0.04
NOx	0.00	0.00	7.23	7.23
VOC	3.02	6.94	0.40	10.36
CO	0.00	0.00	6.07	6.07
total HAPs	3.02	6.94	0.14	10.10
worst case single HAP	3.02 (Styrene)	6.94 (Styrene)	0.136 (Hexane)	9.96 (Styrene)
Total emissions based on rated capacities at 8,760 hours/year.				
* Insignificant activities consist of one ng fired boiler and one ng fired thermal fluid heater.				

**Appendix A: Emission Calculations**  
**Tank VOC Emissions - Maximum PTE**

**Company Name:** Tanco Terminals, Inc.  
**Address City IN Zip:** 400 East Boundary Road, Portage, IN 46368  
**FESOP:** F035-16539-00018  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** October 11, 2003

Tank	Product	Losses (Tons per Year)						Total VOC
ID	Stored	Breathing	Working	Rim Seal	Withdrawal	Deck Fitting	Deck Seam	Tons/yr
<b>Significant (Following emissions are based on the annual limited throughput of 73,000,000 gallons)</b>								
ST-3	Organic liquid	0.29	2.36	--	--	--	--	2.65
ST-4	Organic liquid	0.32	2.70	--	--	--	--	3.02
ST-5	Organic liquid	0.29	2.36	--	--	--	--	2.65
<b>Insignificant</b>								
ST-1	Asphalt	0.00	0.00	--	--	--	--	0.00
ST-2	Asphalt	0.00	0.00	--	--	--	--	0.00
ST-6	Asphalt	0.00	0.00	--	--	--	--	0.00
Total VOC and HAP*		0.91	7.42	--	--	--	--	8.33
<b>Worst Case Tank VOC and HAP* emissions</b>		<b>0.32</b>	<b>2.70</b>					<b>3.02</b>

\* All the VOC emitted is Styrene which is also a HAP.

Note: All storage tank emissions are estimated using USEPA's Tanks 4.09 software program and are based on the estimated maximum annual throughput for styrene.

**Appendix A: Emission Calculations**  
**Emissions from Truck Loading Operations**

**Company Name:** Tanco Terminals, Inc.  
**Address City IN Zip:** 400 East Boundary Road, Portage, IN 46368  
**FESOP:** F035-16539-00018  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** October 11, 2003

**Uncontrolled VOC Emissions**

Material Loaded	B Maximum Throughput kgal/yr *	C Limited Throughput kgal/yr	D Saturation Factor (S)	E MW lb/lb-mole	F Temperature F	G TVP psi	H AP-42 Emission Factor (lb/kgal) 12.46xD x E x G/(F +460)	Maximum Uncontrolled Loading Losses (tons/yr) BxH/2000	Limited Uncontrolled Loading Losses (tons/yr) CxH/2000
Railcar - Styrene Loading	368,000	73,000	0.6	104	50.84	0.0517	0.0787	14.48	2.87
Semi-Tanker - Styrene Loading	368,000	73,000	1.5	104	50.84	0.0517	0.1902	35.00	6.94
<b>Worst Case:</b>		<b>73,000</b>						<b>35.00</b>	<b>6.94</b>

**Notes:**

Emission factor in pounds per thousand gallons loaded, based on AP-42, Table 5.2-1, 5th Ed, 1995.

Note: Styrene loading is limited to less than 87,000 kgal/yr to limit single HAP and total HAPs emissions to less than 10 and 25 tons per year, respectively.

# Appendix A: Emissions Calculations

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## Natural Gas Combustion Only

MM BTU/HR <100

Small Industrial Boiler

Company Name: Tanco Terminals, Inc.

Address City IN Zip: 400 East Boundary Road, Portage, IN 46368

Permit No.: F035-16539-00018

Reviewer: Adeel Yousuf / EVP

Date: October 11, 2003

Unit	Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
One (1) 9.0 mmBtu/hr thermal fluid heater	9.0	
One (1) 7.5 mmBtu/hr natural gas fired boiler	7.5	
	16.5	144.5

Emission Factor in lb/MMCF	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
	1.9	7.6	0.6	100.0	5.5	84.0
				**see below		
Potential Emission in tons/yr	0.14	0.55	0.04	7.23	0.40	6.07

\*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.

\*\*Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

## Methodology

All emission factors are based on normal firing.

MMBtu = 1,000,000 Btu

MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMBtu

Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-006-03 (SUPPLEMENT D 3/98)

Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

**Appendix A: Emissions Calculations**

Page 5 of 5 TSD App A

**Natural Gas Combustion Only****MM BTU/HR <100****Small Industrial Boiler****HAPs Emissions**

**Company Name:** Tanco Terminals, Inc.  
**Address City IN Zip:** 400 East Boundary Road, Portage, IN 46368  
**Permit No.:** F035-16539-00018  
**Reviewer:** Adeel Yousuf / EVP  
**Date:** October 11, 2003

**HAPs - Organics**

Emission Factor in lb/MMcf	Benzene 2.1E-03	Dichlorobenzene 1.2E-03	Formaldehyde 7.5E-02	Hexane 1.8E+00	Toluene 3.4E-03
Potential Emission in tons/yr	1.518E-04	8.672E-05	5.420E-03	1.301E-01	2.457E-04

**HAPs - Metals**

Emission Factor in lb/MMcf	Lead 5.0E-04	Cadmium 1.1E-03	Chromium 1.4E-03	Manganese 3.8E-04	Nickel 2.1E-03
Potential Emission in tons/yr	3.614E-05	7.950E-05	1.012E-04	2.746E-05	1.518E-04

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.  
Additional HAPs emission factors are available in AP-42, Chapter 1.4.